

A&O SHEARMAN

599 Lexington Avenue
New York, NY 10022-6069
+1.212.848.4000

zhaohua.huang@aoshearman.com
212.848.5141

VIA ECF

May 23, 2024

Hon. Loretta A. Preska
U.S. District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Greene, et al. v. City of New York, et al., No. 21-cv-5762-LAP (S.D.N.Y.)

Dear Judge Preska:

We represent Plaintiffs in the above referenced case. We write with Defendants' consent to respectfully seek a ten-day extension to file a Third Amended Complaint ("TAC"), currently due on May 28, 2024. This is Plaintiffs' second request for an extension as it relates to the TAC. The Court granted Plaintiffs' first requested extension on April 23, 2024.

Although Plaintiffs have been diligently working on the TAC, we continue to work through unforeseen circumstances as well as ensuring that the complaint is responsive to Your Honor's March 26, 2024 Order (Dkt. No. 193). Given the holiday weekend, the additional ten days will provide Plaintiffs with additional time to resolve outstanding issues. As a result, we respectfully request until June 7, 2024 to file the TAC. In light of Plaintiffs and Defendants' agreement that, subject to the Court's approval, Defendants' response to the TAC is due on July 22, 2024, 45 days after Plaintiffs' filing of the TAC, at this moment we do not believe the requested extension should affect the Scheduling Order currently in place.

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Hon. Loretta A. Preska
Page 2

May 23, 2024

We appreciate the Court's time and attention to this matter.

Respectfully Submitted,

/s/ Zhaohua Huang

Zhaohua Huang

Counsel for Plaintiffs

cc: All Counsel of Record (via ECF)

Plaintiffs shall file the third amended complaint no later than June 7, 2024. Pursuant to the parties' agreement, Defendants shall have until July 22, 2024 to answer or otherwise move on the third amended complaint. SO ORDERED.

Date: 05/24/24



LORETTA A. PRESKA, U.S.D.J.